

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: PROTON-PUMP INHIBITOR PRODUCTS LIABILITY LITIGATION (NO. II) This Document Relates to: ALL ACTIONS	2:17-md-2789 (CCC)(MF) (MDL 2789) FEBRUARY 20, 2020 STATUS CONFERENCE JOINT STATUS REPORT AND PROPOSED AGENDA
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The parties hereby submit their Joint Status Report and Proposed Agenda in advance of the February 20, 2020 Status Conference.

I. STATUS REPORT

At the time of this filing, approximately 13,635 potentially related actions with 13,666 plaintiffs are pending in federal court.

Currently, approximately 89 state court actions/plaintiffs are pending in the Delaware Superior Court, New Castle County, before Judge Eric M. Davis, 69 state court actions/plaintiffs are pending in the Circuit Court of Cook County, Illinois before Judge Brendan A. O' Brien, 47 state court actions/plaintiffs are pending in a multicounty litigation ("MCL") in New Jersey state court in Atlantic County before Judge John C. Porto, 1 action/plaintiff is pending in New York Supreme Court in New York County before Justice Freed, and 22 actions/plaintiffs are pending in the Court of Common Pleas, Hamilton County, Ohio before Judge Sylvia Hendon.

II. PROPOSED AGENDA FOR FEBRUARY 20, 2020 STATUS CONFERENCE

The Parties have met and conferred and propose the following Agenda:

- Plaintiffs' January 31, 2020 Submission of Production Information for the Plaintiffs in Alleged Violation of the Tolling Agreement and Subject to Defendants' Tolling Motions to Dismiss;
- Update on Bellwether Eligible Case Review Process;

- Update on status of interim resolution reached between the parties concerning record retrieval through the Marker Group, Inc.;
- PSC's Open Motion to Quash Non-Party Discovery Request [Dkt. Nos. 520, 534, 543, and 549];
- Defendants' Proposed CMO to Govern Process for Cases in which Plaintiffs Have Failed to Serve Plaintiff Fact Sheets as Required by CMO No. 9;
- PEC's Open Motions to Challenge Privilege Claims [Dkt. Nos. 388 and 433];
- Update on Defendant Discovery;
 - Update on Deposition Scheduling
 - AstaZeneca's Continuing SAS production;
 - AstraZeneca's Response for Clinical and Preclinical Trial Information; and
 - PSC's Third Request for Production of Documents.

III. TELEPHONIC MONITORING OF THE CASE MANAGEMENT CONFERENCE

As instructed by the Court, counsel has arranged for a telephonic conference line so interested attorneys can monitor the proceedings. Dial-in information is as follows:

Dial In: (888) 808-6929

Access Code: 9945288#

Note that the status conference is scheduled to begin at 10:00 a.m. eastern.

Dated: February 14, 2020